

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

CAROLYN KRAVETZ, and
BORIS LEVITIN,

Defendants.

)
)
) Criminal Action
) NO. 08-10251-JLT
)
)
)
)
)

ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY BRIEF

Defendant Boris Levitin, through his attorneys and pursuant to Local Rules 7.1(b)(3) and 112.1, hereby moves this Court for an Order permitting him to file a reply to the government's response to his motions to dismiss, sever and withhold the disclosure of previously issued subpoenas. In support of this Motion, Levitin states as follows:

1. Levitin filed pretrial motions on April 27, 2009.
2. On May 31, 2009, the government sought - and was granted - an extension of time in which to file its response to Levitin's motions, which was eventually filed on July 20, 2009.
3. Levitin believes that the Court would greatly benefit from additional briefing regarding several arguments raised by the government.
4. Due to an illness in the immediate family of Levitin's counsel, Jeffrey Lichtman, as well as co-counsel Marc Fernich's upcoming nuptials and extended honeymoon, AUSA Vassili Thomadakis has agreed to the reply being filed on or before September 23, 2009.
5. Levitin has also agreed to exclude speedy trial time between July 20, 2009 and September 23, 2009 in the interests of justice.

WHEREFORE, defendant Levitin respectfully requests that this Court grant his Motion for an Order permitting him to file a reply brief.

Dated: New York, New York
July 27, 2009

Respectfully submitted,

LAW OFFICES OF JEFFREY LICHTMAN

By: 

JEFFREY LICHTMAN

750 Lexington Avenue

15th Floor

New York, New York 10022

(212) 581-1001

LAW OFFICE OF MARC FERNICH

By: 

MARC FERNICH

152 W. 57th Street

24th Floor

New York, New York 10019

(212) 446-2346

Attorneys for Defendant Boris Levitin

cc: Vassili Thomadakis, Esq. (By ECF)
Assistant United States Attorney

So Ordered:

Hon. Joseph L. Tauro, U.S.D.J.